

BQC 93-075

Date: December 9, 1993

To: Home Health Agencies

HHA 20

From: Judy Fryback, Director
Bureau of Quality Compliance

Subject: Application of Plan of Care and Clinical Record Requirements to Individuals Receiving
Influenza (Flu) Vaccinations from Home Health Agencies (HHAs)

Enclosed is a copy of Health Care Financing Administration, Division of Health Standards and Quality Regional Program Letter No. 93-66. The purpose of this letter is to inform you of a clarification regarding the administration of the flu vaccine by a Home Health Agency to individuals who receive no additional services.

Please share this information with the appropriate staff. Direct any questions you may have to Stephen D. Schlough, Chief, Hospital and Health Services Section, Bureau of Quality Compliance at the above indicated address or telephone him at (608) 266-3878.

cc: -BQC Staff
-Office of Legal Counsel
-Ann Haney, DOH Admin.
-Kevin Piper, BHCF Dir.
-HCFA, Region V
-Illinois State Agency
-Ohio State Agency
-Michigan State Agency
-Indiana State Agency
-Minnesota State Agency
-WI Coalition for Advocacy
-Serv. Employees Internat'l Union
-WI Counties Assn.
-WI Health Info. Mgmt. Assn.
-WANH
-Commission on Geriatric Health
-WI Assn. of Nursing Homes
-Bd. on Aging & Long Term Care
-WI Homecare Association
-Bureau of LTS, DCS
-Non-LTC BQC Memo Subscribers

Department of Health & Human Services
Health Care Financing Administration
Region V
105 West Adams Street
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Chicago, Illinois 60603-6201

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Refer to: CO8

Division Of Health Standards And Quality Regional Program Letter No. 93-66

Subject: Application of Plan of Care and Clinical Record Requirements to Individuals Receiving Influenza (Flu) Vaccinations from Home Health Agencies (HHAs)

The purpose of this memorandum is to inform you of a recent policy clarification by the Bureau of Policy Development in HCFA Central Office regarding the administration of the flu vaccine by an HHA to an individual who only receives the flu vaccine from an HHA and is provided no additional services from the HHA. The attached policy clarification states, in part:

"In those circumstances where the influenza vaccine is administered to an individual who receives no additional services from the HHA and who has not been formally admitted into the care of the HHA, we do not believe the HHA is obligated to establish a plan of care for the administration of the influenza vaccine. In this circumstance, the individual receiving the vaccine is not a "patient" of the HHA, but merely the recipient of a single service that is generally available to all Medicare beneficiaries regardless of health or homebound status and may be furnished by a wide variety of Medicare providers and suppliers. We do not believe it would be appropriate to require the HHA to establish a plan of care for each vaccine recipient when the identical service can also be covered when furnished by a variety of other individuals or entities who are not held to the same standard.

If the HHA is administering the vaccine to an individual as part of a continuing plan of care (i.e., if the HHA is providing or has provided services in addition to the vaccination), then it should be subject to the provisions of section 1861(o)(3) and must obtain a physician's order for all services, including the vaccination."

If you have any questions regarding this matter, please contact your program representative.

/s/ William F. Pfeifer
Branch Chief
Survey & Certification Operations Branch
Division of Health Standards and Quality